Compliance Testing

2007 EMA Certification Workshop
April 24, 2007
Testing Goals

- Confirmatory Certification Testing
  - Establishing a compliance presence
  - Delivering the emission benefits of regulations
  - Ensuring a level playing field
  - Finding and remedying emission problems prior to introduction into commerce
  - Encouraging compliance and deterring non-compliance
NRCC

• **2006**
  - Four engine families tested - All in compliance with standards
  - Met with manufacturers individually

• **2007**
  - Four engine families selected (letters sent) - Approximately four more this FY
• Lessons Learned
  – Revisions made to engine set up document
    • Clarifying info requested from manufacturers
    • Additional test cell diagram provided
  – Appropriate engine hours for conf. cert. tests
    • Regulations 40 CFR 89.118 (a)(2) - A manufacturer may elect to consider as stabilized emission levels from engines with no more than 125 hours of service.
    • EPA guidance – Engines should have less than 125 hours
Future Testing

• Eventually expand to other industries

• Nonroad SI confirmatory cert testing
  – Beginning Fall 07
  – Industry meeting in July
  – Initial focus on Non Handheld

• Highway diesel confirmatory cert testing
  – Plan to begin in MY2010
  – Incorporate testing time into your development/certification/production schedule

• Submitting certification plans will minimize delays
In Use Testing

- Selections for 2007 Manufacturer In Use Selections made for Marine SI, Large SI and Locomotive Industries
  - Plans required for LSI and Loco
  - Use templates to report results

- 2006 HD In Use Selection letters sent last December
  - PM pilot program delayed until 2007
  - 2006 Reports due December 2008
  - DFR for accuracy margins to be published this summer
LD Experience

• Integrated program assuring emission compliance:
  – 400 LD Certificates issued annually
  – Pre-Production Certification
    • Ensure pollution prevention through proper design
    • Detects problems early
    • 200 EPA conf. cert tests per year (≈15% of vehicle models)
    • 1200 manufacturer cert tests annually
  – Production Line Testing
    • Verify that production vehicle matches certified prototype
    • Rarely used because of strong cert and in use program
  – In-use Testing & Recall
    • Find and remedy problems
    • 150 EPA tests per year
    • 2000 Manufacturer In Use Verification Program (IUVP) test per year
    • 1 – 3 million vehicles recalled per year